

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK**

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

No. 1:18-cv-00719-CCR

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

**NOTICE OF CONSENT MOTION FOR ORDER SUPPLEMENTING PROTECTIVE
ORDER GOVERNING PRODUCTION OF ATTORNEYS' EYES ONLY AND
CONFIDENTIAL MATERIALS**

Plaintiffs, with the consent of Defendants, move this Court pursuant to Local Rule 7 of the Local Civil Rules of Western New York and Rule 26(e) of the Federal Rules of Civil Procedure for an order supplementing the Modified Protective Order Governing Production of Attorneys' Eyes Only Confidential Materials (ECF No. 118) and entered by the Court on January 24, 2020 (the "Modified Protective Order"). The parties' submit this motion in order to expedite Defendants' production of documents by minimizing or eliminating the amount of redactions that Defendants must make to IAD materials and COMPSTAT and GIVE reports. Plaintiffs together with Defendants hereby move this Court for an Order modifying the Protective Order as set forth in the Proposed Order submitted herewith.

Dated: August 7, 2023

Respectfully Submitted,

/s/ Jordan S. Joachim

Jordan S. Joachim
Christine Nelson
COVINGTON & BURLING, LLP
620 Eighth Ave., Suite 4029
New York, NY 10018
Tel: 212-841-1000
Fax: 212-841-1010
jjoachim@cov.com
cnelson@cov.com

Keisha Williams
WESTERN NEW YORK LAW CENTER
37 Franklin Street, Suite 210
Buffalo, NY 14202
Tel: 716-828-8415
kwilliams@wnylc.com

A. Chinyere Ezie
Baher Azmy
CENTER FOR CONSTITUTIONAL
RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel/Fax: 212-614-6464
cezie@ccrjustice.org
bazmy@ccrjustice.org

Claudia Wilner
Anjana Malhotra
Edward Krugman
NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE
50 Broadway, Suite 1500
New York, NY 10004
Tel: 212-633-6967
wilner@nclej.org
malhotra@nclej.org
krugman@nclej.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2023, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Jordan S. Joachim